



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA

Quantel Saunders

3582727

(Enter above the full name of the plaintiff
or plaintiffs in this action).

(Inmate Reg. # of each Plaintiff)

VERSUS

CIVIL ACTION NO. 2:21-cv-00299
(Number to be assigned by Court)

CAPT Clifford, CAPT Toney,
LT Wilson, ASS Frame, Warden Ames
Srg Pete, Srg Wilson.

(Enter above the full name of the defendant
or defendants in this action)

COMPLAINT

I. Previous Lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

Yes _____

No ✓

B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit:

Plaintiffs: _____

Defendants: _____

2. Court (if federal court, name the district; if state court, name the county):

3. Docket Number: _____

4. Name of judge to whom case was assigned:

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

6. Approximate date of filing lawsuit: _____

7. Approximate date of disposition: _____

II. Place of Present Confinement:

Mt. Olive Corr Complex

A. Is there a prisoner grievance procedure in this institution?

Yes X No _____

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes X No _____

C. If your answer is YES:

1. What steps did you take?

Filed Grievance to the
highest available

2. What was the result?

Denied all levels

D. If your answer is NO, explain why not:

III. Parties

(In item A below, place your name and inmate registration number in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff:

Quintel Saunders

Address:

1 mountain side way Mt Olive, WV 25185

B. Additional Plaintiff(s) and Address(es):

(In item C below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item D for the names, positions, and places of employment of any additional defendants.)

- C. Defendant: CAPT Clifford
 is employed as: CHPT
 at Mt Olive Corr Complex
- D. Additional defendants: CAPT Toney LT Wilson
ASS Frame, Warden Ames, Srg Pete, Srg Wilson

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

see Attached

Statement of Claim

1. I was placed in Q2 segregation in Dec 2020 in Jan 2021 a day before my ~~real~~ release. I was placed on Administrative Segregation.
2. After finding out I'll have to be in Q2 solitary for a year. I began to ask several staff about the time, or clock for me to be able to pray on time because my Religion requires me to pray 5x a day at certain times.
3. I was denied by CAPT Toney, LT Wilson, CAPT Clifford, ASS ~~Warden~~ Frame, Warden Arnes, Srg Pete, Srg Wilson and several more to name a few that I asked several times.
4. I then wrote CAPT Clifford after asking others verbally to have a watch at least for Ramadan a Very Important Month for my religion.
5. I was told I can have the watch only for Ramadan, then I have to get it in my property.
6. I complained that I will still need the time to pray 5x a day. still was told Ramadan month only.

7. With being able to fast & pray on time on Ramadan, I was willing to except only knowing the time for that Month.
- 8.) After Filing Grievance & civil suit for other reasons I was then told I could not have my watch that I was approve to have for Ramadan Month
9. This was done to not allow me to pray! when I'm suppose to.
10. Also done to Harass Me about my religion, as well as Retaliate for Grievance & civil Actions against MCL.
11. I was told I wasn't approved but I kept all ~~proof~~ proof that I was because I knew this would happen. see Exhibits
12. I was also told that clocks would be put in the pod for this exact reason. (For Muslims to pray)
13. No Clock was ever put inside any Pod whatsoever.
14. I was made to send my watch back to the Company & not allowed to have it.

Statement of Claim

15. I've been in B2 over 5 1/2 months & have not been able to pray at any time my Religion wants me to
16. I feel bad depressed & like I let my God down because I can't pray at the exact times that I am suppose to
17. I've asked officers numerous times to tell me the time or to let me know what time is. I was denied Every Single Time!
18. MCC Staff & Administrations don't have any human guard or care for my beliefs & religion whatsoever.
19. MCC not allowing me to practice my believe & Religion is clearly a Violation of my Constitutional Rights First Amendment
20. The Free Exercise Clause of the First Amendment protects my right to follow the practices of my religion like eating Kosher food, covering my hair or praying at a certain time
21. MCC did NOT allow me to follow the practices of my Religion nor pray at certain times.

- 22 The Establishment Clause of the First Amendment keeps the government from encouraging you to follow a certain religion or be religious.
- 23 MAC wouldn't allow me to pray & practice my Muslim religious. So the encourage and/or made me ~~was~~ not be able to do what muslims do. Therefore I was encouraged to be a different religion.
- 24 Each Defendant is sued individually and in his official capacity. At all times mentioned in this complaint each defendant acted under the color of state law.
- 25 its May 10, 2021 & I still Not once been able to practice my Religious beliefs nor pray at the times my Religion wants me to pray
- 26 See Exhibits
- 27 Not allowing me ~~time~~ to practice my religion, know the time so I can pray 5x a week, and encouraging me to follow other religions Violated plaintiff Quantel Saunders rights and constituted Free Exercise Clause and Establishment Clause under the First Amendment to the United States Constitution.

Statement of Claim

28 The Plaintiff has no plain, adequate or complete remedy at law to redress the wrongs described herein. Plaintiff has been and will continue to be irreparably injured by the conduct of the defendants unless this court grants the declaratory and injunctive relief which plaintiff seeks.

Verification

I have read the foregoing complaint and hereby verify that the matters alleged therein are true, except as matters alleged on information and belief and as to those, I believe them to be true. I certify under penalty of perjury that the foregoing is true and correct.

Executed at Mt Olive, WV May 10, 2021

Quantel Saunders



IV. Statement of Claim (continued):

See Attached

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments.
Cite no cases or statutes.

1.) Declaration that the acts and omissions described herein violated plaintiff's rights under the Constitutional and laws of the United States

2.) A preliminary and permanent injunction ordering defendants to put a clock in all pod in Q1 & Q2. Also ~~allow~~ inmates watches while in Q1 & Q2.

3.) Compensatory damages in the amount of \$40,000.00 against each defendant, jointly and severally

4.) Punitive damages in the amount of \$40,000.00 against each defendant

V. Relief (continued):

5.) A jury trial on all issues triable by jury
6.) Plaintiff's cost in this suit
7.) Any additional relief this court deems just, proper and equitable

VII. Counsel

- A. If someone other than a lawyer is assisting you in preparing this case, state the person's name:

- B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action?

Yes X No _____

If so, state the name(s) and address(es) of each lawyer contacted:

Paul Strobel, Charleston WV 25301
Linda Miles 225 Wilkey St Morgantown WV 26505

If not, state your reasons: _____

- C. Have you previously had a lawyer representing you in a civil action in this court?

Yes _____ No X

If so, state the lawyer's name and address:

Signed this 10 day of May, 20 21.

GS

Signature of Plaintiff or Plaintiffs

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 10, 2021
(Date)

GS

Signature of Movant/Plaintiff

Signature of Attorney
(if any)

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

Quintel Saunders

Your full name

v.

Civil Action No.: 2:21-cv-00299

CAPT Clifford, CAPT Toney

ASS Frame, Warden Ames

Sgt Pete, Sgt Wilson


Enter above the full name of defendant(s) in this action

Certificate of Service

I, Quintel Saunders (your name here), appearing *pro se*, hereby certify
that I have served the foregoing 42 USC § 1983 (title of document
being sent) upon the defendant(s) by depositing true copies of the same in the United States mail,
postage prepaid, upon the following counsel of record for the defendant(s) on

May 10, 2021 (insert date here):

(List name and address of counsel for defendant(s))


(sign your name)